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May 15, 2025

**VIA ECF**

Hon. Judge Philip M. Halpern  
 United States District Judge  
 Southern District of New York  
 United States Courthouse  
 500 Pearl Street, Room 1950  
 New York, New York 10007

Re: *Kristin Stein v. Town of Greenburgh, et al.* 21-cv-05673 (PMH)  
 File No.: 11174.00005

Dear Judge Halpern:

We represent defendants the Town of Greenburgh, Greenburgh Police Chief Kobie Powell, and Captain Frank Farina (the “Defendants”). We write jointly on behalf of Defendants and Plaintiff regarding the parties’ submission of their respective motions in limine and the joint proposed jury instructions and verdict forms which were filed today. The parties have conferred regarding the jury instructions and verdict form and were able to agree as to proposed general instructions; however, the parties were unable to agree as to the proposed instructions for the substantive claims and damages due to disputes between the parties concerning which issues remain in the case after the March 25, 2025 decision on summary judgment. The parties have included their respective proposed instructions on these points with the opposing parties’ objections in the materials filed today.

The disputed issues are largely set out in the Defendants’ motion in limine. Accordingly,

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the parties request an opportunity to review and revise the proposed jury instructions and verdict form after the Court's ruling on the motion in limine.

Respectfully submitted,

WILSON, ELSER, MOSKOWITZ,  
EDELMAN & DICKER LLP

A handwritten signature in black ink that reads "John M. Flannery".

John M. Flannery

cc: Counsel of Record (via ECF)